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March 14, 2022

VIA CM/ECF

Honorable Judge Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square - Courtroom 1106
New York, NY 10007

Application granted in part. The initial pretrial conference scheduled for March 16, 2022, is adjourned to April 6, 2022, at 4:00 p.m. The parties shall call (888) 363-4749 and enter the access code 558-3333. The parties' deadline to file a proposed case management plan and a joint letter is extended to March 30, 2022. Defendants' deadline to answer or otherwise respond to the complaint is extended to April 8, 2022.

Dated: March 15, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

**Re: Girotto v. Moroso USA, Inc. et al.
Case 1:21-cv-10108-LGS**

Dear Judge Schofield:

All parties jointly file the following request. The parties have recently discussed and conferred in this action brought by Plaintiff for relief under Title III of the Americans with Disabilities Act regarding the possibility of a settlement without the need for protracted litigation, and respectfully jointly request the following.

The parties hereby respectfully jointly request a 60-day stay and/or extension of all deadlines, including an adjournment of the March 16, 2022 Initial Pretrial Conference and an extension of Defendants Moroso USA, Inc.'s and 150 Greene Street Corp.'s time to answer the complaint or file dispositive motions to and including May 13, 2022. The parties have begun substantive settlement negotiations and are desirous of continuing those discussions without further litigation. The parties also are assessing whether this action should be referred to the Mediation Program. As noted above, the basis for this joint request is to avoid any motion practice and to conserve further attorney's fees and costs, while working diligently towards full settlement.

The parties jointly apologize to the Court for the late filing, as the Parties had been circulating drafts of the Joint Letter since last week, which caused delay, while beginning to engage in settlement discussions.

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Thank you for your consideration of this initial stay/extension request in this matter.

Respectfully submitted,

By: /S/ B. Bradley Weitz

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